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13 Attorneys for Plaintiff

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 **HILDA L. SOLIS,**
17 Secretary of Labor,
18 United States Department of Labor,
19
20 Plaintiff,
21 v.

22 **T&P RESTAURANT CORPORATION,**
23 d/b/a **THAI PARADISE RESTAURANT,**
24 a California corporation;

25 **PRATERNG WINNIE CHU,** individually
26 and as managing agent of the corporate
27 defendant;

28 and

DAVID LU, individually and as managing
agent of the corporate defendant,

Defendants.

CV11 04935MRP MRW
Case No. _____

**COMPLAINT FOR INJUNCTIVE
RELIEF AND TO RECOVER
AMOUNTS DUE UNDER THE
FAIR LABOR STANDARDS ACT
(FLSA), 29 U.S.C. §§ 201, et seq.**

1. Plaintiff, Hilda L. Solis, Secretary of Labor, United States Department of Labor ("Plaintiff" or the "Secretary"), brings this action to enjoin Defendants T&P Restaurant Corporation, d/b/a Thai Paradise Restaurant ("Corporate Defendant" or "Thai Paradise"), Praterng Winnie Chu, individually and as managing agent

**COMPLAINT FOR INJUNCTIVE RELIEF AND TO RECOVER AMOUNTS DUE UNDER
THE FAIR LABOR STANDARDS ACT (FLSA)**

1 of Corporate Defendant ("Defendant Chu"), and David Lu, individually and as
2 managing agent of Corporate Defendant ("Defendant Lu") (Corporate Defen-
3 dant, Defendant Chu, and Defendant Lu are hereafter collectively referred to as
4 "Defendants"), from violating the provisions of Section 15(a)(2) and 15(a)(5) of
5 the Fair Labor Standards Act of 1938, as amended ("FLSA"), 29 U.S.C.
6 §§ 215(a)(2) and 215(a)(5), respectively, and to recover wages owed under the
7 FLSA to present and former employees of Defendants, including but not limited
8 to those individuals listed by name in Exhibit 1 to this Complaint, attached
9 hereto.

10 2. This Court has subject matter jurisdiction over the matter pursuant to Section 17
11 of the FLSA, 29 U.S.C. § 217. This court also has subject matter jurisdiction
12 over the matter pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and
13 28 U.S.C. § 1345 (United States as plaintiff).

14 3.

- 15 a. Corporate Defendant, at all times material, has been a California corpora-
16 tion, with an office and place of business located at 909 W. Las Tunas
17 Drive, San Gabriel, California 91776, and at all times material has been en-
18 gaged in business as a Thai cuisine restaurant.
- 19 b. Upon information and belief, Defendant Chu resides within the jurisdiction
20 of this Court.
- 21 c. Upon information and belief, Defendant Chu is the 100% owner of Corpo-
22 rate Defendant.
- 23 d. Defendant Chu, at all times material, has acted directly or indirectly in the
24 interest of Corporate Defendant in relation to the employees of Corporate
25 Defendant.
- 26 e. Upon information and belief, Defendant Lu resides within the jurisdiction
27 of this Court.
- 28

1 f. Defendant Lu, at all times material, has acted directly or indirectly in the in-
2 terest of Corporate Defendant in relation to the employees of Corporate De-
3 fendant.

4 4. At all times material, the activities of Corporate Defendant constitute, and have
5 constituted, related activities performed through unified operation or common
6 control for a common business purpose, and at all times are, and have been, an
7 "enterprise" within the meaning of Section 3(r) of the FLSA, 29 U.S.C.

8 § 203(r).

9 5. At all times material, the enterprise has had employees engaged in commerce or
10 in the production of goods for commerce or in handling, selling, or otherwise
11 working on goods or materials which have been moved in or produced for
12 commerce. This enterprise has had an annual gross volume of sales made of no
13 less than \$500,000.00 and is an "[e]nterprise engaged in commerce or in the
14 production of goods for commerce" as defined by Section 3(s) of the FLSA, 29
15 U.S.C. § 203(s).

16 6. Defendants have violated, and are violating, the provisions of Sections 6 and
17 15(a)(2) of the FLSA, 29 U.S.C. §§ 206 and 215(a)(2), respectively, by employ-
18 ing employees engaged in commerce, or in the production of goods for com-
19 merce, within the meaning of the FLSA, or employed in an enterprise engaged
20 in commerce, or in the production of goods for commerce, within the meaning
21 of the FLSA, at wage rates less than the applicable federal minimum wage,
22 which was \$6.55 per hour during the period of July 24, 2008 to July 23, 2009,
23 and \$7.25 per hour, effective July 24, 2009.

24 7. Defendants have violated, and are violating, the provisions of Sections 7 and
25 15(a)(2) of the FLSA, 29 U.S.C. §§ 207 and 215(a)(2), respectively, by employ-
26 ing employees engaged in commerce, or in the production of goods for com-
27 merce, within the meaning of the FLSA, or employed in an enterprise engaged
28 in commerce, or in the production of goods for commerce, within the meaning

1 of Section 3(s) of the FLSA, 29 U.S.C. § 203(s), for work weeks longer than
2 forty (40) hours without compensating said employees at rates not less than one
3 and one-half times the regular rates at which they were employed.

- 4 8. Defendants have violated, and are violating, the provisions of Sections 11(c)
5 and 15(a)(5) of the FLSA, 29 U.S.C. §§ 211(c) and 215(a)(5), respectively, by
6 failing to maintain, keep, make available to authorized agents of the Secretary
7 for inspection, transcription, and/or copying, and preserve records of their em-
8 ployees and of the wages, hours, and other conditions and practices of employ-
9 ment maintained, as prescribed by the regulations promulgated by the Secretary
10 pursuant to authority granted in the FLSA and published at 29 C.F.R. Part 516.

11 9.

- 12 a. During the period commencing on or about November 23, 2008, Defen-
13 dants have repeatedly violated the aforementioned provisions of the FLSA.
14 b. Defendants' violations of the provisions of the FLSA were willful and/or
15 repeat in nature.
16 c. As a result of the violations of the aforementioned provisions of the FLSA,
17 there is unpaid monetary compensation due under the FLSA that is being
18 withheld by Defendants.
19 d. Judgment permanently enjoining and restraining such violations of the
20 FLSA is specifically authorized by Section 17 of the FLSA, 29 U.S.C.
21 § 217.
22 e. Judgment enjoining and restraining any continued withholding of unpaid
23 monetary compensation due under the FLSA is specifically authorized by
24 Section 17 of the FLSA, 29 U.S.C. § 217.
25 f. Judgment awarding unpaid back wages due under the FLSA, plus an addi-
26 tional amount as liquidated damages that is equal to the amount of back
27 wages that accrued under the FLSA, is specifically authorized by Section
28 16(c) of the FLSA, 29 U.S.C. § 216(c).


1 WHEREFORE, cause having been shown, the Secretary prays for judgment as fol-
2 lows:

- 3 1. For an Order pursuant to Section 17 of the FLSA, 29 U.S.C.
4 § 217, permanently enjoining and restraining Defendants, their
5 officers, agents, servants and employees, and all persons in active
6 concert or participation with them, from violating the provisions
7 of Section 15(a)(2) and 15(a)(5) of the FLSA, 29 U.S.C.
8 §§ 215(a)(2) and 215(a)(5), respectively; and
- 9 2. For an Order:
 - 10 a. Pursuant to Section 16(c) of the FLSA, 29 U.S.C.
11 § 216(c), finding Defendants liable for unpaid minimum
12 wage and overtime compensation owed to present and
13 former employees of Defendants, including but not lim-
14 ited to those persons listed by name in the attached Ex-
15 hibit 1, plus an additional amount as liquidated damages
16 that is equal in amount to the unpaid compensation
17 found due under the FLSA to said employees; or, in any
18 instances where liquidated damages are not awarded
19 herein;
 - 20 b. Pursuant to Section 17 of the FLSA, 29 U.S.C. § 217,
21 restraining Defendants, their officers, agents, servants,
22 and employees and all persons in active concert or par-
23 ticipation with them, from continuing to withhold the
24 payment of any unpaid minimum wage and overtime
25 compensation found to be due to present and former
26 employees of Defendants, including but not limited to
27 those persons listed by name in the attached Exhibit 1,
28 plus pre-judgment interest computed at the underpay-

c. Such other and further relief as the Court deems necessary and/or appropriate.

M. PATRICIA SMITH
Solicitor of Labor

DANIEL J. CHASEK
Associate Regional Solicitor


GRACE A. KIM
Trial Attorney

Attorney for the Plaintiff
U.S. DEPARTMENT OF LABOR

Re: Solis v. T&P Rest. Corp., et al.
(C.D. Cal. 2011) Case No. CV

EXHIBIT 1**Solis v. T&P Rest. Corp., et al.**

Employee	Last Name	First Name
1	Aroon aka Eng	Wilipda Saeng
2	Benjakallayakorn	Saowaluck
3	Changngam	Rappeeporn
4	Hemhong	Sarinya
5	Luhxfamevitya	Chinnatit
6	Pongpilaipruk	Jira
7	Rangrong	Chayapan
8	Yaisoon	Marisara
9	Yostrakul	Suwanniece

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Mariana P. Pfaelzer and the assigned discovery Magistrate Judge is Michael Wilner.

The case number on all documents filed with the Court should read as follows:

CV11- 4935 MRP (MRWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

The United States District Judge assigned to this case will review all filed discovery motions and thereafter, on a case-by-case or motion-by-motion basis, may refer discovery related motions to the Magistrate Judge for hearing and determination

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

GRACE A. KIM, Trial Attorney (CSBN#247456)
 Office of the Solicitor (Sol#1119433)
 United States Department of Labor
 350 S. Figueroa St., Suite 370
 Los Angeles, CA 90071-1202
 Telephone: (213) 894-3950/Fax: (213) 894-2064

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

HILDA L. SOLIS, Secretary of Labor,
 United States Department of Labor,

PLAINTIFF(S)

v.

T&P RESTAURANT CORPORATION, d/b/a THAI PARADISE
 RESTAURANT, a California corporation; PRATERNG WINNIE
 CHU, individually and as Managing agent of the corporate defen-
 dant; and DAVID LU, individually and as managing agent of the
 corporate defendant,

DEFENDANT(S).

CASE NUMBER

CV11 04935MRP (MRW)

SUMMONS

TO: DEFENDANT(S): -named above-

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Grace A. Kim, whose address is 350 S. Figueroa Street, Ste. 370; Los Angeles, CA 900171-1202. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JUN 10 2011

By: CHRISTOPHER POWERS
 Deputy Clerk



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) HILDA L. SOLIS, Secretary of Labor, United States Department of Labor	DEFENDANTS T&P RESTAURANT CORPORATION, d/b/a THAI PARADISE RESTAURANT, a California corporation, PRATERNG WINNIE CHU, individually and as managing agent of the corporate defendant; and DAVID LU, individually and as managing agent of the corporate defendant.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) GRACE A. KIM, Trial Attorney United States Department of Labor, Office of the Solicitor 350 S. Figueroa St., Suite 370, Los Angeles, CA 90071, (213) 894-3950	Attorneys (If Known) EDWIN M. ROSENBERG, Attorney 3435 Wilshire Blvd., Suite 2360, Los Angeles, CA 90010, (213) 389-1131

II. BASIS OF JURISDICTION (Place an X in one box only.) <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$** _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Complaint for injunctive relief and to recover amounts due under the Fair Labor Standards Act (FLSA), 29 U.S.C. 201, et seq.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: _____

CV11 04935

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☒ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
T&P Restaurant Corp. d/b/a Thai Paradise Restaurant -- Los Angeles; Praterng Winnie Chu -- Los Angeles; David Lu -- Los Angeles	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties
Note: In land condemnation cases, use the location of the tract of land involved

X SIGNATURE OF ATTORNEY (OR PRO PER): *[Signature]* Date 06/07/11

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases.

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969 (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))